

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI**

_____ **DIVISION**

CIVIL COMPLAINT

Mark G Scarborough)
dba: mjis.com)
_____)

Enter above the full name of Plaintiff or Plaintiffs in this action)

vs.)

Chris Johnson)
dba: BidWare.com)
_____)
_____)

Enter above the full name of Defendant or Defendants in this action)

06-0567-CV-W - ODS

CASE NO. _____

I. Parties to this Civil Action

(In item A below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any, on back side of this sheet.)

A. Name of Plaintiff Mark G Scarborough

Address 904 East Gudgell
Independence, MO 64055
816-254-4895

(In item B below, place the full name of the defendant in the first blank, his official position in the second adding word blank, and his place of employment in the third blank. Use item C for the names, positions, and places of employment of any additional defendants.)

B. Defendant, Chris Johnson is employed as

Owner at Bidware.com.

C. Additional Defendants _____

II. Statement of Claim

(State here as briefly as possible the facts of your claim. Describe how each named defendant is involved. Include the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of **related** claims, number and set forth each claim in a separate paragraph. [Use as much space as you need to state the facts. Attach extra sheets if necessary.]

~~Unrelated~~ separate claims should be raised in separate civil actions.)

On 6/15/2006 Chris Johnson filed 3 VeRO claim forms with eBay stating in writing under penalty of perjury that he was the rightful owner of our company's intellectual property.

III. Relief

State briefly exactly what you want the Court to do for you.

Enforce the law described for someone making 3 written statements under penalty of perjury and also to regain all loss of income and costs incurred for having to deal with this situation caused by Chris Johnson/dba: BidWare.com.

Make no legal arguments. Cite no cases or statutes.

IV. Do you claim the wrongs alleged in your complaint are continuing to occur at the present time?

Yes No ☒

V. Do you claim actual or punitive monetary damages for the acts alleged in your complaint?

Yes ☒ No

If you answered yes, state the amounts claimed and the **reasons** you claim you are entitled to recover money damages

I am claiming a loss of \$3,000.00 for each VeRO claimed under penalty of perjury and all filing and court costs incurred. I estimate filing and court costs at \$1,000.00 for a total of \$10,000.00

VI. Counsel

Do you have an attorney to represent you in this civil action?

Yes No ☒

A. Have you made any effort to contact a private attorney to determine if he or she would represent you in this civil action?

Yes No ☒

B. If you answered yes, state the names and addresses of the attorneys contracted, and give the results of those efforts.

C. If you answered no, state your reasons why no such efforts have been made.

This is an extremely easy situation to prove perjury. I will have the three signed VeRO claims that clearly state under penalty of perjury Chris Johnson signed and can prove he knowingly

committed perjury and I can easily prove it.

VII. Administrative Procedures

- A. Have the claims which you make in this civil action been presented through any type of Administrative Procedure within any government agency?

Yes No X

- B. If you answered yes, state the date your claims were so presented, how they were presented, and the result of that procedure.

- C. If you answered no, give the reasons, if any, why the claims made in this action have not been presented through Administrative Procedures.

Signed this 12 day of July, 2006

Mark P. Garbarino

Signature of Plaintiff or Plaintiffs

VERIFICATION

State of Missouri)

County of St. Helena

DAVID S. Garbering, being first duly sworn under oath, presents that he is the plaintiff in this action; that he knows the contents of the complaint; and that the information contained therein is true to the best of his knowledge and belief.

Wm. B. Searough

Signature of Plaintiff or Plaintiffs

SUBSCRIBED AND SWORN TO before me this 13 day of July, 2006

Michelle L. McDowell
Notary Public

4-14-08
My Commission Expires



MICHELLE L. MCDOWELL
Clinton County
My Commission Expires
April 14, 2008